IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA CHARLESTON DIVISION

IN RE: ETHICON, INC.
PELVIC REPAIR SYSTEMS
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. ON THE ATTACHED EXHIBIT:

JOINT MOTION TO DISMISS DEFENDANT AMERICAN MEDICAL SYSTEMS, INC. WITHOUT PREJUDICE

Plaintiffs in the cases listed on the attached Exhibit A and defendant American Medical Systems, Inc. ("AMS") jointly move the court to dismiss AMS as a defendant in these actions without prejudice, and terminate AMS from the docket in these actions, parties to bear their own costs. Other defendants remain in these actions, and plaintiffs will continue to prosecute their actions against them.

Respectfully:

/s/ Tracy G. Weiss
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Attorney for Plaintiffs on Exhibit A

Dated: March 18, 2015

EXHIBIT A

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
	Patricia Wright v. Johnson & Johnson, C.R. Bard, Inc., American Medial
2:12-cv-02336	Systems, Inc., Boston Scientific Corp, Ethicon, Inc., John Does 1-25
	Brenda Vaughan v. Johnson & Johnson, Bard, American Medical
2:12-cv-04993	Systems, Inc., Boston Scientific Corp., John Does 1-25
	Deborah Henry v. Ethicon, Inc., Johnson & Johnson, Boston Scientific
2:12-cv-05179	Corp., American Medical Systems, Inc., Bard, John Does 1-25

CERTIFICATE OF SERVICE

I hereby certify that on March 18, 2015, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these member cases.

/s/Tracy G. Weiss